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FILED

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

U.S. BANKRUPTCY COURT
BY  DEPUTY

IN RE:	§	CASE NO. 10-31410-LMC-CH13
	§	
	§	
IDIN SAFABAKHSH,	§	
Debtor(s).	§	JUDGE LEIF M. CLARK

NOTICE OF RULE 2004 EXAMINATION

La Tierra Interiors, Inc. and La Tierra Interiors Solid Surfaces, LLC, claimants, creditors and parties in interest in the above captioned proceedings, by and through the undersigned attorney, will examine Mr. Idin Safabakhsh under oath, on September 22, 2010, beginning at 9:00 AM. The examination shall take place at 7362 Remcon Circle, El Paso, Texas. The examination may continue from day to day until completed. If the examinee receives this notice less than fourteen (14) days prior to the scheduled examination date, the examination will be rescheduled to a mutually agreeable time, upon timely prior request to the undersigned attorney.

The examination is pursuant to Bankruptcy Rule 2004 and L. Rule 2004(b), (c) of the Bankruptcy Local Rules, and will be taken before an officer authorized to record the testimony. The scope of the examination shall be as described in Bankruptcy Rule 2004. Pursuant to Local Rule 2004 (c), no order shall be necessary. The examinee is further requested to bring to the examination all of the documents described on the Schedule A attached hereto.

Respectfully submitted,

THE LAW OFFICES OF MICHAEL R. NEVAREZ
A Professional Corporation
P.O. Box 920786
El Paso, Texas 79902
Telephone: (915) 603-1882
Facsimile: (915) 538-7413
Email: MRN@MRN4Law.com



Date: September 8, 2010

/s/ Michael R. Nevarez

By: **MICHAEL R. NEVAREZ**

State of Texas Bar No. 14933400

Attorney for Claimants

SCHEDULE A
(Documents Requested)

The following documents, both originals and all non-identical copies thereof, whether in your actual possession, custody, or control, or in the possession, custody, or control of any and all present or former directors, officers, employees, consultants, accountants, attorneys or other agents, are to be produced for examination and copying at the above Rule 2004 Examination:

1. REQUEST: Produce all documents, including checks, bounced checks, canceled checks, returned checks, check registers, checkbooks and bank statements, summarizing or reflecting payments and deposits in the bank accounts of Mr. Idin Safabakhsh, Ms. Maria Teresa Ramos, World of Flooring, World of Granite, World of Granite by Dashcar, AAZIZ, LLC, Alatis Co., and Alatis Company, individually and/or otherwise, for the period beginning January of 2007, and ending the date of the request.
2. REQUEST: Produce all ledgers, bills, invoices, statements, journals, balance sheets, profit and loss statements, and other sources of financial data, including accounts payable and receivable, and other records of income and assets and obligations and expenditures, and all other documents that relate to the business activities of Mr. Idin Safabakhsh, Ms. Maria Teresa Ramos, World of Flooring, World of Granite, World of Granite by Dashcar, AAZIZ, LLC, Alatis Co., and Alatis Company, individually and/or otherwise, for the period beginning January of 2007, and ending the date of the request.
3. REQUEST: Produce all assumed name certificates, partnership agreements, member agreements, member certificates, corporate bylaws, corporate charters, stock transfer ledgers, minutes, minute books, and all other documents that relate to the formation, governance and/or termination of the business activities of Mr. Idin Safabakhsh, Ms. Maria Teresa Ramos, World of Flooring, World of Granite, World of Granite by Dashcar, AAZIZ, LLC, Alatis Co., and Alatis Company, individually and/or otherwise, for the period beginning January of 2007, and ending the date of the request.
4. REQUEST: Produce all income tax returns and schedules filed by Mr. Idin Safabakhsh, Ms. Maria Teresa Ramos, World of Flooring, World of Granite, World of Granite by Dashcar, AAZIZ, LLC, Alatis Co., and Alatis Company, individually and/or otherwise, for the period beginning January of 2007, and ending the date of the request.
5. REQUEST: Produce all credit files and reports, loan applications, guaranties, notes, deeds, deeds of trust, deposit slips, security agreements, receipts and other records of payments that relate to the purchase and/or sale of real estate by Mr. Idin Safabakhsh, Ms. Maria Teresa Ramos, World of Flooring, World of Granite, World of Granite by Dashcar, AAZIZ, LLC, Alatis Co., and Alatis Company, individually and/or otherwise, for the period beginning January of 2007, and ending the date of the request.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 2004 (b) of the Bankruptcy Local Rules, I hereby CERTIFY that by letter of September 7, 2010, I requested that counsel for the above named examinee contact me immediately for a telephone conference in order to arrange a mutually agreeable time, date and place for the above Rule 2004 Examination, in the event the above proposed time, date and place was not convenient. Counsel for the above named examinee has neither contacted me for said telephone conference, nor indicated to me that the above proposed time, date and place for the Rule 2004 Examination was not convenient.

Respectfully submitted,

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September 8, 2010

/s/ Michael R. Nevarez
By: MICHAEL R. NEVAREZ
State of Texas Bar No. 14933400

Attorney for Claimants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Rule 2004 Examination and Schedule A thereto was served either by electronic means as listed on the Court's ECF noticing system, or by regular first class mail, postage prepaid, to the following parties in interest, on or before September 8, 2010:

DEBTOR:

IDIN SAFABAKHSH
3433 TOUCHSTONE PL
EL PASO, TX 79936

DEBTOR'S ATTORNEY:

J. TODD SOUTHERN
5601 MONTANA AVE.
STE A
EL PASO, TX 79925

TRUSTEE:

STUART C. COX
1760 N. LEE TREVINO DRIVE
EL PASO, TX 79936

Respectfully submitted,

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September 8, 2010

/s/ Michael R. Nevarez

By: MICHAEL R. NEVAREZ
State of Texas Bar No. 14933400

Attorney for Claimants